





FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2016 SEP 14 PM 8:58

September 13, 2016

MEMORANDUM

**SENSITIVE**

TO: The Commission

THROUGH: Alec Palmer *for PCO*  
Staff Director

FROM: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Debbie Chacona *for PCO*  
Assistant Staff Director  
Reports Analysis Division

BY: *KDR* Kristin D. Roser/Ben Holly *B.H.*  
Reports Analysis Division  
Compliance Branch

SUBJECT: Reason To Believe Recommendation -2016 July Quarterly Report for the  
Administrative Fine Program

Attached is a list of political committees and their treasurers who failed to file the 2016 July Quarterly Report in accordance with 52 U.S.C. § 30104(a). The July Quarterly Report was due on July 15, 2016.

The committees listed in the attached RTB Circulation Report either failed to file the report, filed the report no more than thirty (30) days after the due date (considered a late filed report), or filed the report more than thirty (30) days after the due date (considered a non-filed report). In accordance with the schedule of civil money penalties for reports at 11 C.F.R. 111.43, these committees should be assessed the civil money penalties highlighted on the attached circulation report.

An explanation of the civil money penalties calculation for the following committees that failed to file the report is outlined below:

The committee (AF 3122) represents a candidate that participated in the 2016 Primary in Georgia. The committee was required to file a 2016 July Quarterly Report (Q2) covering May 5, 2016 through June 30, 2016 (57 days). In order to determine the civil money penalty, an estimated level of activity was calculated using a per diem average by multiplying the previous

activity reported for the 2015-2016 election cycle (\$684,828) by 45.60% (the number of days required in Q2 (57) divided by the number of days included in the Committee's 2015-2016 election cycle reports (125)).

The committee (AF 3130) represents a candidate that participated in the 2016 Primary in California. The committee was required to file a 2016 July Quarterly Report (Q2) covering May 19, 2016 through June 30, 2016 (43 days). In order to determine the civil money penalty, an estimated level of activity was calculated using a per diem average by multiplying the previous activity reported for the 2015-2016 election cycle (\$257,711) by 30.93% (the number of days required in Q2 (43) divided by the number of days included in the Committee's 2015-2016 election cycle reports (139)).

#### **Recommendation**

1. Find reason to believe that the political committees and their treasurers, in their official capacity, listed on the RTB Circulation Report violated 52 U.S.C. § 30104(a) and make a preliminary determination that the civil money penalties would be the amounts indicated on the RTB Circulation Report.
2. Send the appropriate letters.

Federal Election Commission  
Reason to Believe Circulation Report  
2016 JULY QUARTERLY Not Election Sensitive 07/15/2016 H\_S\_P\_UNAUTH

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3117	C00572537	AMERICANS SOCIALLY UNITED		CARY L. PETERSON	\$233,949	1		Not Filed	\$233,949 (est)	\$11,106
3118	C00588756	BRIAN SIMS FOR CONGRESS	BRIAN KENDALL SIMS	ANDREA LAWFUL SANDERS	\$535,449	0		Not Filed	\$267,725 (est)	\$10,935
3119	C00498927	CITIZENS SUPER PAC FOR AMERICA (CSPAC)		SIDDIQ MUMIN	\$463,130	0		Not Filed	\$144	\$144
3120	C00554253	CLAITOR FOR CONGRESS	DANIEL A. CLAITOR	CHELSEA BONNECAZE	\$120,518	4		Not Filed	\$120,518 (est)	\$12,302
3121	C00551465	COMMITTEE TO ELECT J.D. WINTEREGG	J.D. WINTEREGG	BETH COX	\$165,803	0		Not Filed	\$27,634 (est)	\$1,157
3122	C00613786	COWAN FOR CONGRESS, INC.	DANIEL COWAN	LEIGH ANN GILLIS	\$684,828	0		Not Filed	\$312,281 (est)	\$10,935
3123	C00030734	DISTILLED SPIRITS COUNCIL OF THE UNITED STATES INC POLITICAL ACTION COMMITTEE		MARK GORMAN	\$181,065	0	7/28/2016	13	\$43,269	\$611

3126	C00518365	ESPAILLAT FOR CONGRESS	ADRIANO ESPAILLAT	RAFAEL LANTIGUA	\$103,607	0	8/8/2016	24	\$9,379	\$208
3127	C00593525	ESPAILLAT FOR CONGRESS 2016	ADRIANO ESPAILLAT	RAYSA CASTILLO	\$1,070,219	0	8/8/2016	24	\$341,768	\$8,602

3129	C00354613	INT LONGSHOREMENS ASSOC (ILA) LOCAL 1291 POLITICAL ACTION COMMITTEE		MARTIN MASCUILLI	\$113,849	3		Not Filed	\$19,804	\$1,125
3130	C00606897	MATT KOKKONEN FOR CONGRESS	MATT KOKKONEN	JACOB THOMAS	\$257,711	0		Not Filed	\$79,710 (est)	\$4,784

3132	C00150995	NATIONAL PAC INC A/K/A NATPAC		DEBORAH ANN CAPOCCI	\$195,419	0		Not Filed	\$65,139 (est)	\$3,691
3133	C00134676	PHOENIX FIRE FIGHTERS, LOCAL 493, FIRE PAC COMMITTEE		BRYAN WILLINGHAM	\$376,301	0	7/21/2016	6	\$59,878	\$1,028
3134	C00362632	SWING STATES FOR A CONSERVATIVE WHITE HOUSE PAC INC		OFFICE OF TREASURER	\$134,449	0		Not Filed	\$44,816 (est)	\$1,157

AF#	Committee ID	Committee Name	Candidate Name	Treasurer	Threshold	PV	Receipt Date	Days Late	LOA	RTB Penalty
3135	C00613216	THE CANDIDATE BILLY DAVIS INC.	BILLY DAVIS	BILLY DAVIS	\$146,000	0		Not Filed	\$17,906 (est)	\$643
3136	C00550649	TOM CARTER FOR CONGRESS	THOMAS G. CARTER	THOMAS CARTER	\$137,286	0		Not Filed	\$137,286 (est)	\$6,151
3137	C00573428	WHITWELL FOR CONGRESS	ROBERT QUENTIN WHITWELL JR.	OFFICE OF TREASURER	\$437,531	1		Not Filed	\$72,922 (est)	\$4,613
3138	C00520064	WILLIAM LLOP CPA FOR CONGRESS	WILLIAM LLOP	WILLIAM LLOP	\$312,739	0	7/22/2016	7	\$109,185	\$2,017
3139	C00592519	YUNGMAN LEE FOR CONGRESS	YUNGMAN F. LEE	GUANG QUAN WU	\$739,988	0	7/27/2016	12	\$88,669	\$2,191

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
)  
Reason To Believe Recommendation – )  
2016 July Quarterly Report for the )  
Administrative Fine Program: )  
AMERICANS SOCIALLY UNITED, and ) AF# 3117  
PETERSON, CARY L as treasurer; )  
BRIAN SIMS FOR CONGRESS, and ) AF# 3118  
SANDERS, ANDREA LAWFUL as )  
treasurer; )  
CITIZENS SUPER PAC FOR AMERICA ) AF# 3119  
(CSPAC), and SIDDIQ MUMIN as )  
treasurer; )  
CLAITOR FOR CONGRESS, and ) AF# 3120  
CHELSEA BONNECAZE as treasurer; )  
COMMITTEE TO ELECT JD ) AF# 3121  
WINTEREGG, and COX, BETH as )  
treasurer; )  
COWAN FOR CONGRESS, INC., and ) AF# 3122  
GILLIS, LEIGH ANN as treasurer; )  
DISTILLED SPIRITS COUNCIL OF THE ) AF# 3123  
UNITED STATES INC POLITICAL )  
ACTION COMMITTEE, and GORMAN, )  
MARK MR. as treasurer; )

ESPAILLAT FOR CONGRESS, and ) AF# 3126  
LANTIGUA, RAFAEL as treasurer; )  
ESPAILLAT FOR CONGRESS 2016, and ) AF# 3127  
RAYSA CASTILLO as treasurer; )

INT LONGSHOREMENS ASSOC (ILA) ) AF# 3129  
LOCAL 1291 POLITICAL ACTION )  
COMMITTEE, and MARTIN MASCUILLI )  
as treasurer; )  
MATT KOKKONEN FOR CONGRESS, ) AF# 3130  
and THOMAS, JACOB CPA as treasurer; )

NATIONAL PAC INC A/K/A NATPAC, ) AF# 3132  
and CAPOCCI, DEBORAH ANN MRS. as )  
treasurer; )  
PHOENIX FIRE FIGHTERS, LOCAL 493, ) AF# 3133  
FIRE PAC COMMITTEE, and )  
WILLINGHAM, BRYAN as treasurer; )  
THE CANDIDATE BILLY DAVIS INC., ) AF# 3135  
and DAVIS, BILLY as treasurer; )  
TOM CARTER FOR CONGRESS, and ) AF# 3136  
CARTER, THOMAS as treasurer; )  
WILLIAM LLOP CPA FOR CONGRESS, ) AF# 3138  
and WILLIAM LLOP as treasurer; )  
YUNGMAN LEE FOR CONGRESS, and ) AF# 3139  
GUANG QUAN WU as treasurer; )

CERTIFICATION

I, Shawn Woodhead Werth, Secretary and Clerk of the Federal Election

Commission, do hereby certify that on September 15, 2016 the Commission took the

following actions on the Reason To Believe Recommendation – 2016 July Quarterly

Report for the Administrative Fine Program as recommended in the Reports Analysis

Division's Memorandum dated September 13, 2016, on the following committees:

AF#3117 Decided by a vote of 6-0 to: (1) find reason to believe that AMERICANS SOCIALLY UNITED, and PETERSON, CARY L in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3118 Decided by a vote of 6-0 to: (1) find reason to believe that BRIAN SIMS FOR CONGRESS, and SANDERS, ANDREA LAWFUL in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3119 Decided by a vote of 6-0 to: (1) find reason to believe that CITIZENS SUPER PAC FOR AMERICA (CSPAC), and SIDDIQ MUMIN in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3120 Decided by a vote of 6-0 to: (1) find reason to believe that CLAITOR FOR CONGRESS, and CHELSEA BONNECAZE in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3121 Decided by a vote of 6-0 to: (1) find reason to believe that COMMITTEE TO ELECT JD WINTEREGG, and COX, BETH in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3122 Decided by a vote of 6-0 to: (1) find reason to believe that COWAN FOR CONGRESS, INC., and GILLIS, LEIGH ANN in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3123 Decided by a vote of 6-0 to: (1) find reason to believe that DISTILLED SPIRITS COUNCIL OF THE UNITED STATES INC POLITICAL ACTION COMMITTEE, and GORMAN, MARK MR. in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.



AF#3126 Decided by a vote of 6-0 to: (1) find reason to believe that ESPAILLAT FOR CONGRESS, and LANTIGUA, RAFAEL in his official as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3127 Decided by a vote of 6-0 to: (1) find reason to believe that ESPAILLAT FOR CONGRESS 2016, and RAYSA CASTILLO in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3129 Decided by a vote of 6-0 to: (1) find reason to believe that INT LONGSHOREMENS ASSOC (ILA) LOCAL 1291 POLITICAL ACTION COMMITTEE, and MARTIN MASCUILLI in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3130 Decided by a vote of 6-0 to: (1) find reason to believe that MATT KOKKONEN FOR CONGRESS, and THOMAS, JACOB CPA in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3132 Decided by a vote of 6-0 to: (1) find reason to believe that NATIONAL PAC INC A/K/A NATPAC, and CAPOCCI, DEBORAH ANN MRS. in her official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3133 Decided by a vote of 6-0 to: (1) find reason to believe that PHOENIX FIRE FIGHTERS, LOCAL 493, FIRE PAC COMMITTEE, and WILLINGHAM, BRYAN in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3135 Decided by a vote of 6-0 to: (1) find reason to believe that THE CANDIDATE BILLY DAVIS INC., and DAVIS, BILLY in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3136 Decided by a vote of 6-0 to: (1) find reason to believe that TOM CARTER FOR CONGRESS, and CARTER, THOMAS in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3138 Decided by a vote of 6-0 to: (1) find reason to believe that WILLIAM LLOP CPA FOR CONGRESS, and WILLIAM LLOP in his official capacity as treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

AF#3139 Decided by a vote of 6-0 to: (1) find reason to believe that YUNGMAN LEE FOR CONGRESS, and GUANG QUAN WU in his official capacity is treasurer violated 52 U.S.C. 30104(a) and make a preliminary determination that the civil money penalty would be the amount indicated on the report; (2) send the appropriate letter. Commissioners Goodman, Hunter, Petersen, Ravel, Walther, and Weintraub voted affirmatively for the decision.

Attest:

September 16, 2016  
Date

Shawn Woodhead Werth  
Shawn Woodhead Werth  
Secretary and Clerk of the Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

September 16, 2016

William Llop, in official capacity as Treasurer  
William Llop CPA for Congress  
6065 Roswell Rd., Suite 400  
Atlanta, GA 30328

C00520064  
AF#: 3138

Dear Mr. Llop:

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires that your committee file a July Quarterly Report of Receipts and Disbursements every calendar year. This report, covering the period May 5, 2016 through June 30, 2016, shall be filed no later than July 15, 2016. 52 U.S.C. § 30104(a). Records at the Federal Election Commission ("FEC") indicate that this report was filed on July 22, 2016, 7 days late.

The Act permits the FEC to impose civil money penalties for violations of the reporting requirements of 52 U.S.C. § 30104(a). 52 U.S.C. § 30109g(a)(4). On September 15, 2016, the FEC found that there is reason to believe ("RTB") that William Llop CPA for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) by failing to file timely this report on or before July 15, 2016. Based on the FEC's schedules of civil money penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at the RTB stage is \$2,017. Please see the attached copy of the Commission's administrative fine regulations at 11 CFR §§ 111.30-111.55. Attachment 1. The Commission's website contains further information about how the administrative fine program works and how the fines are calculated. See <http://www.fec.gov/af/af.shtml>. 11 CFR § 111.34. Your payment of \$2,017 is due within forty (40) days of the finding, or by October 25, 2016, and is based on these factors:

Election Sensitivity of Report: Not Election Sensitive  
Level of Activity: \$109,185  
Number of Days Late: 7  
Number of Previous Civil Money Penalties Assessed: 0

At this juncture, the following courses of action are available to you:

**1. If You Choose to Challenge the RTB Finding and/or Civil Money Penalty**

If you should decide to challenge the RTB finding and/or calculated civil money penalty, you must submit a written response to the FEC's Office of Administrative Review, 999 E Street, NW, Washington, DC 20463. Your response must include the AF# (found at the top of page 1 under your committee's identification number) and be received within forty (40) days of the

Commission's RTB finding, or October 25, 2016. 11 CFR § 111.35(a). Your written response must include the reason(s) why you are challenging the RTB finding and/or calculated civil money penalty, and must include the factual basis supporting the reason(s) and supporting documentation. The FEC strongly encourages that documents be submitted in the form of affidavits or declarations. 11 CFR § 111.36(c).

The FEC will only consider challenges that are based on at least one of three grounds: (1) a factual error in the RTB finding; (2) miscalculation of the calculated civil money penalty by the FEC; or (3) your demonstrated use of best efforts to file in a timely manner when prevented from doing so by reasonably unforeseen circumstances that were beyond your control. 11 CFR § 111.35(b). In order for a challenge to be considered on the basis of best efforts, you must have filed the required report no later than 24 hours after the end of these reasonably unforeseen circumstances. *Id.* Examples of circumstances that will be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) a failure of Commission computers or Commission-provided software despite your seeking technical assistance from Commission personnel and resources; (2) a widespread disruption of information transmissions over the Internet that is not caused by a failure of the Commission's or your computer systems or Internet service provider; and (3) severe weather or other disaster-related incident. 11 CFR § 111.35(c). Examples of circumstances that will not be considered reasonably unforeseen and beyond your control include, but are not limited to: (1) negligence; (2) delays caused by vendors or contractors; (3) treasurer and staff illness, inexperience or unavailability; (4) committee computer, software, or Internet service provider failures; (5) failure to know filing dates; and (6) failure to use filing software properly. 11 CFR § 111.35(d).

The "failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver" of your right to present such argument in a petition to the U.S. District Court under 52 U.S.C. § 30109. 11 CFR § 111.38.

If you intend to be represented by counsel, please advise the Office of Administrative Review. You should provide, in writing, the name, address and telephone number of your counsel and authorize counsel to receive notifications and communications relating to this challenge and imposition of the calculated civil money penalty.

**2. If You Choose Not to Pay the Civil Money Penalty and Not to Submit a Challenge**

If you do not pay the calculated civil money penalty and do not submit a written response, the FEC will assume that the preceding factual allegations are true and make a final determination that William Llop CPA for Congress and you, in your official capacity as treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty.

Unpaid civil money penalties assessed through the Administrative Fine regulations will be subject to the Debt Collection Act of 1982 ("DCA"), as amended by the Debt Collection Improvement Act of 1996, 31 U.S.C. § 3701 *et seq.* The FEC may take any and all appropriate action authorized and required by the DCA, as amended, including transfer to the U.S. Department of the Treasury for collection. 11 CFR § 111.51(a)(2).

**3. If You Choose to Pay the Civil Money Penalty**

If you should decide to pay the calculated civil money penalty, follow the payment instructions on page 4 of this letter. Upon receipt of your payment, the FEC will send you a final determination letter.

**NOTICE REGARDING PARTIAL PAYMENTS AND SETTLEMENT OFFERS**

**4. Partial Payments**

If you make a payment in an amount less than the calculated civil money penalty, the amount of your partial payment will be credited towards the full civil money penalty that the Commission assesses upon making a final determination.

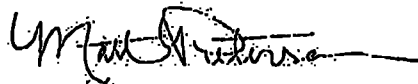
**5. Settlement Offers**

Any offer to settle or compromise a debt owed to the Commission, including a payment in an amount less than the calculated civil money penalty assessed or any restrictive endorsements contained on your check or money order or proposed in correspondence transmitted with your check or money order, will be rejected. Acceptance and deposit or cashing of such a restricted payment does not constitute acceptance of the settlement offer. Payments containing restrictive endorsements will be deposited and treated as a partial payment towards the civil money penalty that the Commission assesses upon making a final determination. All unpaid civil money penalty amounts remaining will be subject to the debt collection procedures set forth in Section 2, above.

This matter was generated based on information ascertained by the FEC in the normal course of carrying out its supervisory responsibilities. 52 U.S.C. § 30109(a)(2). Unless you notify the FEC in writing that you wish the matter to be made public, it will remain confidential in accordance with 52 U.S.C. § 30109(a)(4)(B) and 30109(a)(12)(A) until it is placed on the public record at the conclusion of this matter in accordance with 11 CFR § 111.42.

As noted earlier, you may obtain additional information on the FEC's administrative fine program, including the final regulations, on the FEC's website at <http://www.fec.gov/af/af.shtml>. If you have questions regarding the payment of the calculated civil money penalty, please contact Ben Holly in the Reports Analysis Division at our toll free number (800) 424-9530 (at the prompt press 5) or (202) 694-1130. If you have questions regarding the submission of a challenge, please contact the Office of Administrative Review at our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Matthew S. Petersen  
Chair

**ADMINISTRATIVE FINE REMITTANCE & PAYMENT INSTRUCTIONS**

In accordance with the schedule of penalties at 11 CFR § 111.43, the amount of your civil money penalty calculated at RTB is \$2,017 for the 2016 July Quarterly Report.

You may remit payment by ACH withdrawal from your bank account, or by debit or credit card through Pay.gov, the federal government's secure portal for online collections. Visit [www.fec.gov/af/pay.shtml](http://www.fec.gov/af/pay.shtml) to be directed to Pay.gov's Administrative Fine Program Payment form.

This penalty may also be paid by check or money order, made payable to the Federal Election Commission. It should be sent by mail to:

Federal Election Commission  
P.O. Box 979058  
St. Louis, MO 63197-9000

If you choose to send your payment by courier or overnight delivery, please send to:

U.S. Bank - Government Lockbox  
FEC #979058  
1005 Convention Plaza  
Attn: Government Lockbox, SL-MO-C2GL  
St. Louis, MO 63101

**PAYMENTS BY PERSONAL CHECK**

Personal checks will be converted into electronic funds transfers (EFTS). Your account will be electronically debited for the amount on your check, usually within 24 hours, and the debit will appear on your regular statement. We will destroy your original check and keep a copy of it. In case the EFT cannot be processed for technical reasons, you authorize us to process the copy in lieu of the original check. Should the EFT not be completed because of insufficient funds, we may try to make the transfer twice.

**PLEASE DETACH AND RETURN THE PORTION BELOW WITH YOUR PAYMENT**

FOR: William Llop CPA for Congress

FEC ID#: C00520064

AF#: 3138

PAYMENT DUE DATE: October 25, 2016

PAYMENT AMOUNT DUE: \$2,017

Member: AICPA

Member: GSCPA

RECEIVED  
FEB 1 1987  
FEB 1 1987



6065 Roswell Road, Suite 400  
Atlanta, Georgia 30328  
(404) 917-2700  
Fax (404) 917-2701

**J.W. Llop, C.P.A., P.C.**  
Certified Public Accountant  
[www.jwlatl.com](http://www.jwlatl.com)

1975 Vineville Avenue, Suite D1  
Macon, Georgia 31201  
(478) 741-7858  
Fax(478) 741-7860

**Date:**

October 25, 2016

**To:**

Federal Election Commission  
FEC's Office of Administrative Review  
999 E Street NW  
Washington, DC 20463

**Subject:**

William Llop, in official capacity as Treasurer  
William Llop, CPA for Congress  
C00520064  
AF#: 3138

To Whom it may concern:

I am writing on the above-named committee.

The committee respectfully wishes to challenge the alleged violation and proposed civil money penalty described in the notice referenced above (copy attached). Please consider the assertions made herein as grounds for relief under 11 CFR § 111.35(b)(3), during your Administrative Fines Program decision.

*The Committee's July Quarterly Report should be considered in compliance with the Federal Election Campaign Act of 1971 ("the Act"), pursuant to CFR § 104.7(a)*

The committee established reasonable procedures to maintain compliance with reporting requirements and deadlines of the act, by contracting with a third party to obtain, maintain and submit information to the Federal Election Commission ("the Commission").

Based on the experience of the third party, and contractual commitments made thereby; the committee had no reason to doubt the third party's competence in meeting the filing requirements or deadlines.

*Grounds for challenging the reason to believe finding and proposed civil money penalty under 11 CFR § 111.35(b)(3)*

Despite the committee's best efforts to obtain, maintain and submit information required to meet the reporting deadlines set forth in 52 U.S.C. § 30104(a) of the act; the committee was prevented from filing in a timely manner by reasonably unforeseen circumstances that were beyond the control of the committee; and the committee filed no later than 24 hours after the end of these circumstances.

1. Circumstances preventing the timely filing were unforeseen:

- The committee provided the necessary documentation (bank statements, contribution records, expense registers, ect.) to allow the third party to file the reports in a timely manner.
- Historically, the third party had filed timely reports on behalf of the committee.



2. The circumstances preventing the filing were beyond the control of the committee:

- The third party was contracted to file election reporting in a timely manner. Based on contractual obligations of the third party, the committee had no reason to believe the reports were being filed in a manner other than contracted.

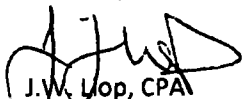
3. Upon learning of the failure to file, the committee took prompt correcting action:

- On July 16, 2016, upon learning of the failure to file from the FEC, the committee alerted the third party (see correspondence attached).
- Again, on July 18, 2016, upon learning of the continued failure to file from the FEC, the committee alerted the third party (see correspondence attached).
- On July 22, 2016, upon discovering that the reports had yet to be filed; the committee took steps to expeditiously file the unfiled report.

#### *Conclusion*

The Court's decision in *Lovely V. FEC*, 307 F. Supp. 2d 294 (D. Mass. 2004) affirmed that your commission should take the "best effort" clause of 11 CFR § 104.7(a) into account when determining compliance with the act. Please adhere to this court's recommendation, and abate any proposed violation or penalty related to the July Quarterly Report discussed herein.

Sincerely,



J.W. Llop, CPA  
J.W. Llop, C.P.A., P.C.  
Atlanta, Georgia

Attached:

1. Notice dated September 16, 2016
2. July 17, 2016 Correspondence to third party filer
3. July 18, 2016 Correspondence to third party filer

## Thomas Bush

---

**From:** William Llop [jwlatl@aol.com]  
**Sent:** Saturday, July 16, 2016 5:37 PM  
**To:** Bush Thomas  
**Subject:** Fwd: FEC Late Notificaion

Wm Llop  
6065 Roswell Road Ste 400  
Atlanta, GA. 30328  
404.917.2700

Begin forwarded message:

**From:** [noreply-efiling@fec.gov](mailto:noreply-efiling@fec.gov)  
**Date:** July 16, 2016 at 2:17:13 PM EDT  
**To:** [jwlatl@aol.com](mailto:jwlatl@aol.com)  
**Subject:** FEC Late Notificaion

Comid :C00520064  
Report Type :Q2  
Due Date :07/15/2016  
COB :06/30/2016  
State :

Please do not reply to this notice. It is sent from an unattended account that cannot receive email.

Our records indicate that you may have been required to file the above report. However, it appears that we have not received the report electronically from you. If you believe you have filed this report or have questions about whether you should be filing this report, please call the Federal Election Commission at (202) 694-1130 or (800) 424-9530, and press 5 for the Reports Analysis Division.

If you need assistance in submitting your report electronically, please call (202) 694-1307 or (800) 424-9530, and press 4 for the Electronic Filing Office.

## Thomas Bush

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**From:** Jwlatl@aol.com  
**Sent:** Monday, July 18, 2016 3:18 PM  
**To:** twb@jwlatl.com  
**Subject:** Fwd: FEC Late Notificaion

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

J.William Llop, CPA

J.W. Llop CPA, PC  
Office: 404-917-2700  
Fax: 404-917-2701  
6065 Roswell Road Ste 400  
Sandy Springs, GA 30328

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### CONFIDENTIALITY NOTICE

This message is intended only for the addressee. It contains information that is confidential and not subject to disclosure. If you are not the intended recipient, or the employee, or a person responsible for delivering the message to the intended recipient, any use of this information, dissemination, distribution or copying of the communication, is strictly prohibited. If you received this communication in error, please notify us immediately by telephone. Thank You.

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**From:** noreply-efiling@fec.gov  
**To:** jwlatl@aol.com  
**Sent:** 7/18/2016 3:04:35 P.M. Eastern Daylight Time  
**Subj:** FEC Late Notificaion

**Comid** : C00520064  
**Report Type** : Q2  
**Due Date** : 07/15/2016  
**COB** : 06/30/2016  
**State** :

Please do not reply to this notice. It is sent from an unattended account that cannot receive email.

Our records indicate that you may have been required to file the above report. However, it appears that we have not received the report electronically from you. If you believe you have filed this report or have questions about whether you should be filing this report, please call the Federal Election Commission at (202) 694-1130 or (800) 424-9530, and press 5 for the Reports Analysis Division.

If you need assistance in submitting your report electronically, please call (202) 694-1307 or (800) 424-9530, and press 4 for the Electronic Filing Office.



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

November 22, 2016

William Llop, Treasurer  
William Llop CPA for Congress  
6065 Roswell Rd., Suite 400  
Atlanta, Georgia 30328

C00520064  
AF#: 3138

Dear Mr. Llop:

On November 1, 2016, the Commission's Office of Administrative Review ("OAR") received your written response ("challenge") for William Llop CPA for Congress and you, in your official capacity as Treasurer, which is being reviewed by OAR. If you have any questions regarding your challenge, please contact this Office on our toll free number (800)424-9530 (press 0, then ext. 1660) or (202)694-1660.

Sincerely,

A handwritten signature in black ink that reads "Rhiannon Magruder".

Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C.

December 28, 2016

**REVIEWING OFFICER RECOMMENDATION  
OFFICE OF ADMINISTRATIVE REVIEW ("OAR")**

AF# 3138 – William Llop CPA for Congress and William Llop, in his official capacity as Treasurer (C00520064)

**Summary of Recommendation**

Make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$2,017 civil money penalty.

**Reason-to-Believe Background**

The 2016 July Quarterly Report was due on July 15, 2016. The respondents filed the report on July 22, 2016, 7 days late. The report is not election sensitive and was filed within 30 days of the due date; therefore, the report is considered late. 11 C.F.R. §§ 111.43(d)(1) and (e)(1).

On September 15, 2016, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2016 July Quarterly Report and made a preliminary determination that the civil money penalty was \$2,017 based on the schedule of penalties at 11 C.F.R. § 111.43. A letter was mailed to the respondents' address of record from the Reports Analysis Division ("RAD") on September 16, 2016 to notify them of the Commission's RTB finding and civil money penalty.

**Legal Requirements**

The Federal Election Campaign Act ("Act") states that the treasurer of a principal campaign committee shall file a report for the quarter ending June 30 no later than July 15. 52 U.S.C. § 30104(a) and 11 C.F.R. § 104.5(a)(1)(i). Reports electronically filed must be received and validated at or before 11:59 pm Eastern Standard/Daylight Time on the filing deadline to be timely filed. 11 C.F.R. §§ 100.19(c) and 104.5(e). The treasurer shall be personally responsible for the timely filing of reports. 11 C.F.R. § 104.14(d).

## Summary of Respondents' Challenge

On November 1, 2016, the Commission received the written response ("challenge") from the Candidate, who also serves as the Treasurer. The challenge explains:

The [C]ommittee established reasonable procedures to maintain compliance with reporting requirements and deadlines of the [A]ct, by contracting with a third party to obtain, maintain and submit information to the Federal Election Commission ("the Commission").

Based on the experience of the third party, and contractual commitments made thereby; the [C]ommittee had no reason to doubt the third party's competence in meeting the filing requirements or deadlines.

The challenge further explains that the circumstances preventing the timely filing were unforeseen and out of the Committee's control. The Committee provided the necessary documentation to allow the third party to timely file the report, the third party had timely filed previous reports, and the third party was contractually obligated to timely file the Committee's reports. Therefore, "the [C]ommittee had no reason to believe the reports were being filed in a manner other than contracted."

The challenge also states the Committee took prompt action once it became aware of the missing report. On July 16, 2016, the Committee received notification that the 2016 July Quarterly Report had not yet been filed, and the Committee alerted the third party. The Committee again alerted the third party on July 18, 2016 after the Commission sent an additional notification. On July 22, 2016, the Committee discovered the report had still not been filed and took steps to expeditiously file the report.

The Candidate concludes by stating:

The *Court's* decision in *Lovely V. FEC*, 307 F. Supp. 2d 294 (D. Mass. 2004) affirmed that your commission should take the "best effort" clause of 11 CFR § 104.7(a) into account when determining compliance with the [A]ct. Please adhere to this *court's* recommendation, and abate any proposed violation or penalty related to the July Quarterly Report discussed herein.

The challenge includes a copy of the RTB Letter and copies of email correspondence between the Candidate and third party.

## **Analysis**

The Reviewing Officer acknowledges the third party may have been contractually obligated to timely file the Committee's reports with the Commission. The Reviewing Officer also recognizes the Committee's efforts to notify the third party of its failure to file the Committee's 2016 July Quarterly Report. However, delays caused by committee vendors or contractors is specifically included at 11 C.F.R. § 111.35(d) as an example of a circumstance that will not be considered reasonably unforeseen and beyond the respondents' control. Their challenge fails to address any of the three valid grounds at 11 C.F.R § 111.35(b). These are: (i) the RTB finding is based on factual errors; and/or (ii) the improper calculation of the civil money penalty; and/or (iii) they used best efforts to file on time but were prevented from doing so by reasonably unforeseen circumstances that were beyond their control and they filed the report no later than 24 hours after the end of these circumstances. Therefore, the Reviewing Officer recommends that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$2,017 civil money penalty.

## **OAR Recommendations**

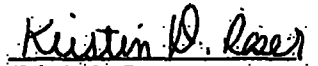
1. Adopt the Reviewing Officer recommendation for AF# 3138 involving William Llop CPA for Congress and William Llop, in his official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 3138 that William Llop CPA for Congress and William Llop, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$2,017 civil money penalty; and
3. Send the appropriate letter.

## **Attachments**

Attachment 1  
Attachment 2  
Attachment 3 – Declaration from RAD  
Attachment 4 – Declaration from OAR

**DECLARATION OF KRISTIN D. ROSER**

1. I am the Chief of the Compliance Branch for the Reports Analysis Division of the Federal Election Commission ("Commission"). In my capacity as Chief of the Compliance Branch, I oversee the initial processing of the Administrative Fine Program. I make this declaration based on my personal knowledge and, if called upon as a witness, could and would testify competently to the following matters.
2. It is the practice of the Reports Analysis Division to document all calls to or from committees regarding a letter they receive or any questions relating to the FECFile software or administrative fine regulations, including due dates of reports and filing requirements.
3. I hereby certify that documents identified herein are true and accurate copies of the following sent by the Commission to William Llop CPA for Congress:
  - A) Reason-to-Believe Letter, dated September 16, 2016, referencing the 2016 July Quarterly Report (sent via overnight mail to the address of record).
4. I hereby certify that I have searched the Commission's public records and find that William Llop CPA for Congress filed the 2016 July Quarterly Report with the Commission on July 22, 2016.
5. Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct and that all relevant telecoms for the matter have been provided. This declaration was executed at Washington, D.C. on the 30<sup>th</sup> day of November, 2016.

  
Kristin D. Roser  
Chief, Compliance Branch  
Reports Analysis Division  
Federal Election Commission



**DECLARATION OF RHIANNON MAGRUDER**

- 1) I am the Reviewing Officer in the Office of Administrative Review for the Federal Election Commission ("Commission"). In my capacity as Reviewing Officer, I conduct research with respect to all challenges submitted in accordance with the Administrative Fine program.
- 2) A principal campaign committee shall file a report for the quarter ending June 30 no later than July 15. Reports filed electronically must be received and validated at or before 11:59 pm, Eastern Standard/Daylight Time on July 15, 2016 for the 2016 July Quarterly Report to be timely filed.
- 3) I hereby certify that I have searched the Commission's public records and that the documents identified herein are the true and accurate copies of:
  - a) Cover page of the 2016 July Quarterly Report filed by William Llop CPA for Congress and William Llop, in his official capacity as Treasurer. The report includes the coverage period of May 5, 2016 through June 30, 2016 and was electronically filed on July 22, 2016.
- 4) Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Washington, D.C. on the 28th day of December, 2016.

*Rhiannon Magruder*

Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review  
Federal Election Commission

**FEC  
FORM 3****REPORT OF RECEIPTS  
AND DISBURSEMENTS**

For An Authorized Committee

Office Use Only

1. NAME OF COMMITTEE (in full) TYPE OR PRINT ▼ Example: If typing, type over the lines. 12FE4M5

William Llop CPA for Congress

ADDRESS (number and street) 6065 ROSWELL RD  
STE 400  
Check if different than previously reported. (ACC) ATLANTA GA 303282. FEC IDENTIFICATION NUMBER ▼ CITY STATE ZIP CODE  
C C00520064 3. IS THIS REPORT X NEW (N) OR AMENDED (A) GA 11

## 4. TYPE OF REPORT (Choose One)

## (a) Quarterly Reports:

April 15 Quarterly Report (Q1)

X July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

## (b) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on M M / D D / Y Y Y Y

in the State of

## (c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on M M / D D / Y Y Y Y

in the State of

5. Covering Period M M / D D / Y Y Y Y 05 05 2016 through M M / D D / Y Y Y Y 06 30 2016

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer WILLIAM LLOP

Signature of Treasurer WILLIAM LLOP

[Electronically Filed]

Date

07 22 2016

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office  
Use  
Only**FEC FORM 3**  
(Revised 02/2003)



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

December 29, 2016

William Llop, Treasurer  
William Llop CPA for Congress  
6065 Roswell Road, Suite 400  
Atlanta, GA 30328

C00520064  
AF#: 3138

Dear Mr. Llop:

On September 15, 2016, the Federal Election Commission ("Commission") found reason to believe ("RTB") that William Llop CPA for Congress and you, in your official capacity as Treasurer ("respondents"), violated 52 U.S.C. § 30104(a) for failing to timely file the 2016 July Quarterly Report. The Commission also made a preliminary determination that the civil money penalty was \$2,017 based on the schedule of penalties at 11 C.F.R. § 111.43.

After reviewing your written response and any supplemental information submitted by you and Commission staff, the Reviewing Officer has recommended that the Commission make a final determination. A copy of the Reviewing Officer's recommendation is attached.

You may file with the Commission Secretary a written response to the recommendation within 10 days of the date of this letter. Your written response should be sent to the Commission Secretary, 999 E Street, NW, Washington, DC 20463 or via facsimile (202-208-3333). Please include the AF # in your response. Your response may not raise any arguments not raised in your original written response or not directly responsive to the Reviewing Officer's recommendation. 11 C.F.R. § 111.36(f). The Commission will then make a final determination in this matter.

Please contact me at the toll free number 800-424-9530 (press 0, then press 1660) or 202-694-1660 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Rhiannon Magruder".

Rhiannon Magruder  
Reviewing Officer  
Office of Administrative Review

160047-1200



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

2017 JAN 24 PM 2:01

January 24, 2017

MEMORANDUM

**SENSITIVE**

To: The Commission

Through: Alec Palmer *swt H for*  
Staff Director

From: Patricia C. Orrock *PCO*  
Chief Compliance Officer

Rhiannon Magruder *RM*  
Reviewing Officer  
Office of Administrative Review

Subject: Final Determination Recommendation in AF# 3138 – William Llop CPA for Congress and William Llop, in his official capacity as Treasurer (C00520064)

On September 15, 2016, the Commission found reason to believe ("RTB") that the respondents violated 52 U.S.C. § 30104(a) for failing to timely file the 2016 July Quarterly Report and made a preliminary determination that the civil money penalty was \$2,017 based on the schedule of penalties at 11 C.F.R. § 111.43.

On November 1, 2016, the Commission received their written response ("challenge"). After reviewing the challenge, the Reviewing Officer Recommendation ("ROR") dated December 28, 2016 was forwarded to the Commission, a copy was forwarded to the respondents, and is hereby incorporated by reference. The Reviewing Officer recommended that the Commission make a final determination that the respondents violated 52 U.S.C. § 30104(a) and assess a \$2,017 civil money penalty.

Within 10 days of transmittal of the recommendation, they may file a written response with the Commission Secretary which may not raise any arguments not raised in their challenge or not directly responsive to the ROR. 11 C.F.R. § 111.36(f). On January 23, 2017, the respondents paid the recommended civil money penalty of \$2,017.

# TECHNOLOGY

1. Adopt the Reviewing Officer recommendation for AF# 3138 involving William Llop CPA for Congress and William Llop, in his official capacity as Treasurer, in making the final determination;
2. Make a final determination in AF# 3138 that William Llop CPA for Congress and William Llop, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$2,017 civil money penalty; and
3. Send the appropriate letter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) AF 3138  
Final Determination Recommendation: )  
William Llop CPA for Congress and )  
William Llop, in his official capacity as )  
Treasurer (C00520064) )

CERTIFICATION

I, Dayna C. Brown, Acting Secretary and Clerk of the Federal Election Commission, do hereby certify that on February 03, 2017, the Commission decided by a vote of 6-0 to take the following actions in AF# 3138:

1. Adopt the Reviewing Officer recommendation for AF# 3138 involving William Llop CPA for Congress and William Llop, in his official capacity as Treasurer, in making the final determination.
2. Make a final determination in AF# 3138 that William Llop CPA for Congress and William Llop, in his official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a \$2,017 civil money penalty.
3. Send the appropriate letter.

Commissioners Goodman, Hunter, Petersen, Ravel, Walther and Weintraub voted affirmatively for the decision.

Attest:

February 3, 2017  
Date

Dayna C. Brown  
Dayna C. Brown  
Acting Secretary and Clerk of the  
Commission



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

February 3, 2017

William Llop, Treasurer  
William Llop CPA for Congress  
6065 Roswell Road, Suite 400  
Atlanta, GA 30328

C00520064  
AF#: 3138

Dear Mr. Llop:

On September 15, 2016, the Federal Election Commission ("the Commission") found reason to believe ("RTB") that William Llop CPA for Congress and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) for failing to file the 2016 July Quarterly Report. By letter dated September 16, 2016, the Commission sent notification of the RTB finding that included a civil money penalty calculated at RTB of \$2,017 in accordance with the schedule of penalties at 11 C.F.R. § 111.43. On November 1, 2016, the Office of Administrative Review received your written response challenging the RTB finding.

The Reviewing Officer reviewed the Commission's RTB finding with its supporting documentation and your written response. Based on this review, the Reviewing Officer recommended that the Commission make a final determination that William Llop CPA for Congress and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assess a civil money penalty in the amount of \$2,017 in accordance with 11 C.F.R. § 111.43. The Reviewing Officer Recommendation was sent to you on December 29, 2016.

On February 3, 2017, the Commission adopted the Reviewing Officer's recommendation and made a final determination that William Llop CPA for Congress and you, in your official capacity as Treasurer, violated 52 U.S.C. § 30104(a) and assessed a civil money penalty of \$2,017. It is based on the same factors used to calculate the civil money penalty at RTB. A copy of the Final Determination Recommendation is attached.

On January 23, 2017, the Commission received your \$2,017 payment.

**If You Choose to Appeal the Final Determination and/or Civil Money Penalty**

If you choose to appeal the final determination, you should submit a written petition, within 30 days of receipt of this letter, to the U.S. District Court for the district in which the committee or you reside, or transact business, requesting that the final determination be modified

or set aside. See 52 U.S.C. § 30109(a)(4)(C)(iii). Your failure to raise an argument in a timely fashion during the administrative process shall be deemed a waiver of the respondents' right to present such argument in a petition to the district court under 52 U.S.C. § 30109. 11 CFR § 111.38.

The confidentiality provisions at 52 U.S.C. § 30109(a)(12) no longer apply and this matter is now public. Pursuant to 11 C.F.R. §§ 111.42(b) and 111.20(c), the file will be placed on the public record within 30 days from the date of this notification.

If you have any questions regarding the payment of the civil money penalty, please contact Rhiannon Magruder on our toll free number (800) 424-9530 (press 0, then ext. 1660) or (202) 694-1660.

On behalf of the Commission,



Steven T. Walther  
Chairman

1100001104000



**WILLIAM LLOP CPA FOR CONGRESS**  
 6065 ROSWELL RD, STE 400  
 ATLANTA, GA 30328

64-10/610

1128

Date 1/9/16

Pay to the  
 order of

FEL

\$ 2617

Two thousand Seventeen

Dollars



**SUNTRUST**

Memo

late fee

[Signature]

CONFIDENTIAL  
 NOT FOR RELEASE

11000N11400

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